

**IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA,  
NORTHERN DIVISION**

**J.B., a minor child, by and through his )  
next friend, ADDIE WARD, on behalf of )  
himself and all other similarly situated; )**

**Plaintiff,**

**vs.**

**WALTER WOOD, in his individual )  
capacity, )**

**Defendant. )**

**Case No: 2:06-CV-755-MHT**

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**J.B., a minor child, by and through his )  
next friend, ADDIE WARD, on behalf of )  
himself and all other similarly situated; )**

**Plaintiff,**

**vs.**

**WALTER WOOD, in his individual )  
capacity, )**

**Defendant. )**

**Case No: 2:06-CV-908-MHT**

**MOTION TO AMEND MOTION**  
**FOR PROTECTIVE ORDER**  
**TO QUASH THE TAKING OF THREE DEPOSITIONS**

The undersigned counsel previously filed on a motion for protective order for Gary Gregg, Queen Barker, and Khaki Sanford. (Doc. 46). This motion is to amend said motion for protective order to include the subpoena for taking the deposition of Jada Ross. Ms. Ross is also an employee of the Department of Youth Services and serves on the Screening and Placement Committee. This motion is based on the same grounds as the original Motion.

WHEREFORE, for the foregoing reasons, the Department moves the Court to enter a protective order quashing the deposition subpoenas of DYS employees-- Gary Gregg, Queen Barker, Khaki Sanford, and Jada Ross--and ordering that the depositions shall not proceed.

Respectfully submitted

TROY KING  
ATTORNEY GENERAL

s/ T. Dudley Perry, Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th<sup>th</sup> day of July, 2007, I electronically filed the forgoing Motion to Amend Motion for Protective Order to Quash the Taking of Three Depositions, with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Youth Services